

Ruetzel & Andress Co., LPA FSL-PAC
75 East Market Street
Akron, Ohio 44308
Telephone: (216) 376-2700
Facsimile: (216) 376-4577

DEC 14 10 45 AM '94

December 12, 1994

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
999 E St., NW
Washington, DC 20463

Re: Identification Number: C00228379
Reference: Your letter RQ-3 of December 8, 1994

Dear Mr. Gibson:

I am writing in response to the referenced letter, which I received on December 12th. In response to your questions, I am submitting the following information:

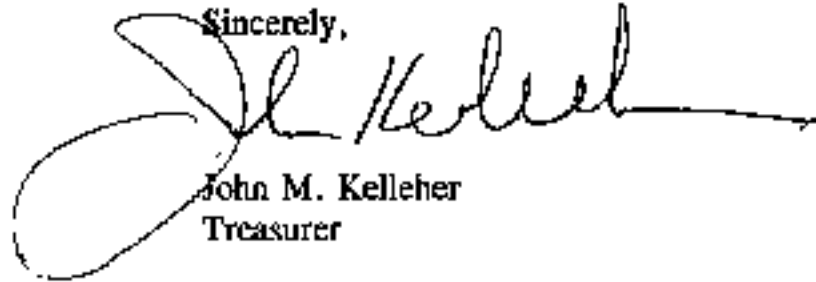
- I received an initial letter on this same subject (Reference: RQ-2 of November 15, 1994) from Mr. Kenneth A. Davis, Jr. on November 28, 1994.
- I spoke by phone with Mr. Davis regarding this letter on November 29, 1994.
- In this conversation I advised Mr. Davis that I would issue refund checks to affected contributors "within the next day or two". These checks were issued on December 1, 1994.
- In this conversation Mr. Davis advised that, since the December 8th report covered the period through November 28th, and since the refund checks would be issued after that date, this corrective action should be reported in our year-end report. He further advised that, under the circumstances, an amended report was not required.
- I sent a letter to Mr. Davis, dated November 30, 1994 (copy attached), reflecting our discussion and corrective action.

Mr. John D. Gibson
December 12, 1994
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Kindly advise if the actions taken are insufficient to meet your needs.

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "John M. Kelleher". The signature is written in dark ink and is positioned above the printed name and title.

John M. Kelleher
Treasurer

JMK:ldl

attachment

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COPY

Roetzel & Andress Co., LPA FSL-PAC
75 East Market Street
Akron, Ohio 44308
Direct Dial Number: (216) 849-6669

November 30, 1994

Mr. Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E St., NW
Washington, DC 20463

Identification Number: C00228379

Reference: Your letter RQ-2 of November 15, 1994

Dear Mr. Davis:

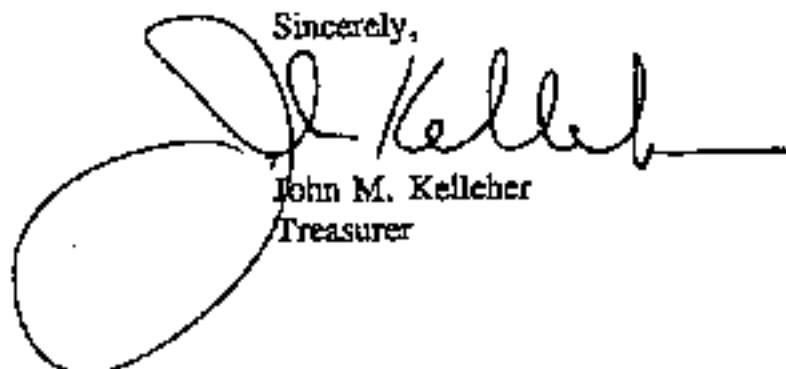
I am writing in response to the referenced letter, which I received on November 28th, and our phone conversation of November 29th regarding its contents. I appreciate you bringing this discrepancy to my attention.

As we discussed, the excess contributions occurred because of our misinterpretation of the restrictions, which we believed applied to each election in a calendar year, whereas, as you pointed out, the restrictions apply to the calendar year in total.

It is our intent to refund the excess to the contributors within the next day or two and, since the report of December 8th covers the period only through November 28th, I shall record and report our corrective action in our December 31st report, again as we discussed.

I appreciate you bringing this error to our attention and regret any inconvenience it has caused.

Sincerely,



John M. Kelleher
Treasurer

JMK:lal

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☐ Hand Delivered

DATE OF RECEIPT

☒ First Class Mail

POSTMARKED

12-18-94

☐ Registered/Certified Mail

POSTMARKED

☐ No Postmark

☐ Postmark Illegible

☐ Received from the House Office of Records
and Registration

DATE OF RECEIPT

☐ Received from the Senate Office of Public
Records

DATE OF RECEIPT

☐ Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

ADD
PREPARED

12-16-94
DATE PREPARED